

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
CASE NO. 4:22-CR-00050-FL-KS-1

UNITED STATES OF AMERICA

vs.

**REQUEST FOR DISCOVERY**  
**(Fed.R.Civ.P. 16, 18U.S.C. §3500)**

TREYVON LADONTE PAGE,  
Defendant.

The Defendant, TREYVON LADONTE PAGE, by and through his counsel, hereby requests that the Government provide copies, or make available for inspection, copying or photographing, each of the following:

1. All written and recorded statements made by the Defendant, or copies thereof, within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the government;
2. That portion of all written records containing the substances of any relevant oral statement made by the Defendant, whether before or after arrest, in response to interrogation by any person then known to the Defendant to be a government agent;
3. The recorded testimony of the Defendant before a grand jury which relates to the offenses charged;
4. The substance of all relevant oral statements made by the Defendant, whether before or after arrest, in response to interrogation by any person then known by the Defendant to be government agent if the government intends to use that statement at trial;
5. Such copy of the Defendant's prior criminal record, including uncharged offenses, as is within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the government;

6. All books, papers, documents, photographs, tangible objects, buildings or places, or copies or portions thereof, which are within the possession, custody or control of the government, and which are material to the preparation of the Defendant's defense;

7. All books, papers, documents, photographs, tangible objects, buildings or places, or copies or portions thereof, which are within the possession, custody or control of the government, and which are intended for use by the government as evidence in chief at trial;

8. All books, papers, documents, photograph, tangible objects, buildings or places, or copies or portions thereof, which are within the possession, custody or control of the government, and which were obtained from or belong to the Defendant;

9. The names and addresses of witnesses who might establish Defendant's innocence, or impeach, discredit or contradict the testimony of any witness whom the Government anticipates calling at the trial of the cause;

10. The complete prior criminal record of each person whom the Government anticipates calling as a witness at the trial of the cause;

11. Information regarding all prior material acts of misconduct by each person whom the Government anticipates calling as a witness at the trial of the cause;

12. All agreements, promises, payments inducements or rewards given or offered to any person in return for that person's cooperation, information or testimony concerning or relating to the facts alleged by the Government in this case;

13. Any information or material which would tend to establish Defendant's innocence or mitigate punishment upon conviction;

14. Any information or material which would tend to impeach, discredit or contradict the testimony of any witnesses whom the Government anticipates calling at the trial of this cause.

15. Any information or material which might reasonably lead to evidence which would impeach,

discredit or contradict the testimony of any witness whom the Government anticipates calling at trial of this cause;

16. Any scientific or medical report, and/or the results thereof, which tends to establish Defendant's innocence or to impeach, discredit or contradict any witness whom the Government will call at the trial of this cause;

17. A written summary of testimony the government intends to use under Rules 702, 703 or 705 of the Federal Rules of Evidence during its case in chief at trial, which summary shall include the witnesses' opinions, the basis and reason therefor, and the witnesses' qualifications.

18. Any evidence deemed favorable to the Defendant regardless of the fact that such evidence involved is the fruition of the "work product" of the United States Attorney, including, but not limited to, any evidence which might be used to impeach any government witnesses.

This the 15th day of April, 2024.

THE LAW OFFICES OF W. H. PARAMORE, III

BY: /s/ W. H. Paramore, III

W. H. PARAMORE, III

Attorney for Defendant

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L.R. 57.1 Counsel

Appointed

CERTIFICATE OF SERVICE

The undersigned certifies and stipulates that a copy of this foregoing Motion was electronically filed consistent with Local Rule 49.2 and served on the persons listed below:

Mr. Peter A. Moore, Jr.  
Clerk, U.S. District Court

Mr. Nathaniel T. Lemons  
Assistant United States Attorney

This the 15th day of April, 2024.

THE LAW OFFICES OF W. H. PARAMORE, III, P.C.

BY: /s/ W. H. Paramore, III  
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L.R. 57.1 Counsel  
Appointed